

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

1) VIDEO GAMING TECHNOLOGIES, INC., )  
 )  
 )  
 Plaintiff, )  
 )  
 )  
 v. ) Case No. 4:17-cv-00454-GKF-jfj  
 )  
 )  
 1) CASTLE HILL STUDIOS LLC ) **REDACTED**  
 (d/b/a CASTLE HILL GAMING); )  
 2) CASTLE HILL HOLDING LLC )  
 (d/b/a CASTLE HILL GAMING); and )  
 3) IRONWORKS DEVELOPMENT, LLC )  
 (d/b/a CASTLE HILL GAMING) )  
 )  
 )  
 Defendants. )

**DECLARATION OF MICHAEL S. SAWYER IN SUPPORT OF  
PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT**

1. I am an attorney with the law firm of Covington & Burling LLP, counsel for Plaintiff Video Gaming Technologies, Inc. (“VGT”). I was admitted *pro hac vice* in this case on August 9, 2017.

2. Attached as **Exhibit A** is a true and correct copy of an e-mail from VGT's counsel to Defendants' counsel dated May 18, 2018.

3. Attached as **Exhibit B** is a true and correct copy of an excerpt from VIDEO GAMING TECHNOLOGIES, INC.'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS TO CASTLE HILL GAMING, served on September 25, 2017.

4. Attached as **Exhibit C** is a true and correct copy of an excerpt from PLAINTIFF'S FIRST SUPPLEMENTAL OBJECTIONS AND RESPONSES TO DEFENDANT CASTLE HILL STUDIO LLC'S FIRST SET OF INTERROGATORIES (NOS. 1-13), served on December 27, 2017.

5. Attached as **Exhibit D** is a true and correct copy of an excerpt from DEFENDANTS' SECOND SUPPLEMENTAL OBJECTIONS AND RESPONSES TO PLAINTIFF'S FIRST INTERROGATORIES TO DEFENDANTS, dated March 16, 2018.

6. Attached as **Exhibit E** is a true and correct copy of a document produced by CHG to VGT bearing Bates stamps CHG0089317-20, which was labeled as Exhibit 162 during the deposition of Andrew Scheiner. This document was first produced on March 15, 2018.

7. Attached as **Exhibit F** is a true and correct copy of an excerpt from a document produced by VGT to CHG bearing Bates stamps VGT0001813-32.

8. Attached as **Exhibit G** is a true and correct copy of a letter from VGT's counsel to Defendants' counsel dated April 11, 2018.

9. Attached as **Exhibit H** is a true and correct copy of a document produced by CHG to VGT bearing Bates stamps CHG0089197-98, which was labeled as Exhibit 153 during the deposition of Andrew Scheiner.

10. Attached as **Exhibit I** is a true and correct copy of an excerpt from the April 19, 2018 deposition transcript of Andrew Scheiner.

11. Attached as **Exhibit J** is a true and correct copy of an excerpt from the May 15, 2018 rough deposition transcript of Alan Roireau.

12. Attached as **Exhibit K** is a true and correct copy of a letter from Defendants' counsel to VGT's counsel dated April 3, 2018.

13. Attached as **Exhibit L** is a true and correct copy of a letter from Defendants' counsel to VGT's counsel dated April 9, 2018.

14. Attached as **Exhibit M** is a true and correct copy of a letter from Defendants' counsel to VGT's counsel dated April 14, 2018.

15. Attached as **Exhibit N** is a true and correct copy of a letter from VGT's counsel to Defendants' counsel dated April 25, 2018.

16. Attached as **Exhibit O** is a true and correct copy of a letter from VGT's counsel to Defendants' counsel dated March 22, 2018.

17. Attached as **Exhibit P** is a true and correct copy of a document produced by CHG to VGT bearing Bates stamps CHG095379–90. This document and the source code referenced therein were first produced on April 13, 2018.

18. Attached as **Exhibit Q** is a true and correct copy of a letter from VGT's counsel to Defendants' counsel dated April 5, 2018.

19. I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 21, 2018 in Washington, District of Columbia.

*/s/ Michael S. Sawyer*  
Michael S. Sawyer

**CERTIFICATE OF SERVICE**

I hereby certify that on May 21, 2018, I filed the foregoing Declaration of Michael Sawyer in Support of Plaintiff's Motion for Leave to File Amended Complaint via ECF, which caused a true and correct copy of the foregoing Declaration to be delivered to the following counsel for Defendants:

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